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DEPARTMENT OF NATURAL RESOURCES

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November 1, 2018

Jeff Studenka, Environmental Scientist
Utah Division of Water Quality-UPDES Section
P.O. Box 144870
Salt Lake City, Utah 84114

Subject: Crandall Canyon Mine, Genwal Resources, Final Reclamation Plan, C/015/0032

Dear Mr. Studenka:

The Division of Oil, Gas and Mining (DOGM) have been working with Genwal Resources (the Permittee) in revising the final reclamation plan at the Crandall Canyon Mine. The final reclamation plans in the current Mining and Reclamation Plan (MRP) did not contemplate several factors that have developed at the mine site over time. One such issue is the mine water that discharges from the north portals (Outfall 002 per #UTU0024368). It's generally agreed that the mine water discharge will continue for some time into the future. As a result, the MRP must account for how the mine water discharge will be handled upon final reclamation of the site.

One option that is under consideration is a pipeline. A pipeline would be constructed that would route the mine-water discharge from the north mine portals down Crandall Canyon where it would ultimately report to Huntington Creek. I'm writing to you to request some clarification/guidance from the Division of Water Quality's (DWQ) perspective as to what issues and steps should be considered with the pipeline concept. I should clarify that the pipeline would not be constructed until such time as coal mining activity has ceased and final reclamation of the site has been initiated

Questions have arisen such as: 1) Can an existing outfall (in this case 002) be re-located or would it be considered a new outfall? 2) Would the Permittee require a new UPDES permit or could the existing permit be revised? 3) Would the Antidegradation Policy outlined in R317-2-3 preclude the pipeline construction and relocation of Outfall 002 from Crandall Creek to Huntington Creek?

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Subject: Crandall Canyon Final Reclamation Plan

DOGM and the Permittee are reluctant to pursue a final reclamation plan design if there are regulatory issues that would preclude its implementation. That said, any guidance and/or clarification from DWQ on the proposed pipeline concept would be greatly appreciated.

If you have any questions, please don't hesitate to call me at (801) 538-5350.

Sincerely,



Steve Christensen
Permit Supervisor

SKC/sqs

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